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February 17, 2023

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**VIA ECF FILING**

Magistrate Judge Sallie Kim  
San Francisco Courthouse  
Courtroom C—15th Floor  
450 Golden Gate Ave.  
San Francisco, CA 94102

RE: *In re: McKinsey & Co., Inc. National Prescription Opiate Consultant Litigation*, Case No. 21-md-02996-CRB (SK)

Dear Magistrate Judge Kim:

The Parties respectfully request a telephonic conference to discuss the procedure to raise disputes about (1) appropriate limits on interrogatories, and (2) a proposed Tribal Plaintiff Fact Sheet and Plaintiff Fact Sheet Implementation Order. See Joint Case Management Statement and Discovery Schedule (“Discovery Schedule”) (Dkt. 440). Plaintiffs do not believe the disputes are ripe and suggest that further guidance from Judge Breyer on a supplemental schedule would narrow or entirely resolve the disputes. McKinsey does not agree that addressing a supplemental schedule is necessary at this time or that it would obviate the Parties’ discovery disputes. The Parties are available for a telephone conference on February 21, 22, or 24, 2023 at the Court’s convenience. The Parties agree that, by requesting a telephone conference in lieu of filing a statement of dispute at this time, no Party waives its right to file a statement of dispute at a later date.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Elizabeth J. Cabraser".

Elizabeth J. Cabraser  
*Plaintiffs' Lead Counsel*

cc: All counsel via ECF

KKM/wp

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